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JOINT STATEMENT REGARDING ORDER RE: DISCOVERY OF ELECTRONICALLY  
 STORED INFORMATION

Case Nos.: 4:20-cv-05640-YGR; 4:11-cv-06714-YGR; 4:19-cv-03074-YGR

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

EPIC GAMES, INC.,

*Plaintiff, Counter-defendant,*

v.

APPLE INC.,

*Defendant, Counterclaimant.*

Case No. 4:20-cv-05640-YGR

IN RE APPLE IPHONE ANTITRUST  
LITIGATION

Case No. 4:11-cv-06714-YGR

DONALD R. CAMERON, *et al.*,

*Plaintiffs,*

v.

APPLE INC.,

*Defendant.*

Case No. 4:19-cv-03074-YGR

**JOINT STATEMENT REGARDING  
ORDER RE: DISCOVERY OF  
ELECTRONICALLY STORED  
INFORMATION**

Judge: Hon. Yvonne Gonzalez Rogers

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JOINT STATEMENT REGARDING ORDER RE: DISCOVERY OF ELECTRONICALLY  
STORED INFORMATION

Case Nos.: 4:20-cv-05640-YGR; 4:11-cv-06714-YGR; 4:19-cv-03074-YGR

1                   **Joint Statement:** Plaintiffs and Defendant Apple Inc. (“Apple”) (collectively, “the  
2 Parties”) have been working diligently to reach agreement on a protocol to govern discovery of  
3 electronically stored information (“ESI”) in the above-captioned actions (“ESI Protocol”). The  
4 Parties were able to reach agreement on every aspect of the ESI Protocol except for one section  
5 (Section 5.I, “Redactions”). Enclosed is a copy of the draft ESI Protocol as otherwise agreed by  
6 the Parties. The Parties are continuing to discuss a potential resolution to the Redactions  
7 provision, and have agreed that they will either reach agreement on the provision by close of  
8 business on October 28, 2020 and resubmit an agreed ESI Protocol to the Court, or, if the Parties  
9 cannot reach agreement, will submit competing ESI Protocols and a joint statement reflecting the  
10 Parties’ respective positions at that time.

11                   Separately, the Parties are also continuing to meet and confer regarding validation  
12 procedures to test the sufficiency and accuracy of the Parties’ productions. The Parties have  
13 agreed that they will either (i) reach agreement on validation procedures by November 9, 2020, or  
14 (ii) if the Parties cannot reach agreement, submit any outstanding issues in a joint statement to  
15 Magistrate Judge Hixson by November 9, 2020.

1 Dated: October 26, 2020

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6 By: /s/ Yonatan Even  
7 Yonatan Even

8 *Attorneys for Plaintiff Epic Games, Inc.*

9 Dated: October 26, 2020

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17 *Plaintiffs*

18 Dated: October 26, 2020

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23 Robert F. Lopez

24 *Interim Class Counsel for Developer*  
25 *Plaintiffs*

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27 JOINT STATEMENT REGARDING ORDER RE: DISCOVERY OF ELECTRONICALLY  
28 STORED INFORMATION

Case Nos.: 4:20-cv-05640-YGR; 4:11-cv-06714-YGR; 4:19-cv-03074-YGR

1 Dated: October 26, 2020

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11  
12 **E-FILING ATTESTATION**

13 I, Jay P. Srinivasan, am the ECF User whose ID and password are being used to file  
14 this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the  
15 signatories identified above has concurred in this filing.

16  
17 /s/ Jay P. Srinivasan

18 Yonatan Even

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JOINT STATEMENT REGARDING ORDER RE: DISCOVERY OF ELECTRONICALLY  
STORED INFORMATION

Case Nos.: 4:20-cv-05640-YGR; 4:11-cv-06714-YGR; 4:19-cv-03074-YGR